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17071 WEST DIXIE HIGHWAY  
NORTH MIAMI BEACH, FL 33160**MEMO ENDORSED**

July 21, 2008

**VIA TELEFAX ONLY 212-805-7949**Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10005RE: St. Paul Fire & Marine Insurance Company a/s/o  
Mover's Inc. v. United Airlines, Inc.  
Docket No.: 08 Civ. 4975 (PKC)  
Our Ref.: 08-F-009-JPK

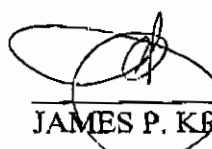
Honorable P. Kevin Castel:

As Your Honor may recall we represent the plaintiff in the captioned proceeding against United Airlines, Inc. We have forwarded notice of Your Honor's Pre-Trial Conference for July 25, 2008 as well as the prior conference notification to United Airlines inasmuch as they have not yet appeared by counsel or otherwise filed an Answer to the Complaint. The defendant was served on June 19, 2008 and their Answer was due on July 9, 2008. We have received no response from United Airlines or their counsel despite various efforts to contact them with respect to this pending matter. We are, therefore, proceeding in applying for a Default Judgment against the defendant and will be submitting the required default application documents in accordance with Local Rule 55.1 and 55.2 shortly.

If Your Honor requires any further information or clarification with regard to the above, please contact the undersigned at Your Honor's convenience. We will attend the conference on July 25, 2008 as presently scheduled but it does not appear that any appearance will be made on behalf of defendant at least upon current information.

Respectfully submitted,

BADI AK &amp; WILL, LLP

  
 JAMES P. KRAUZLIS

JPK/lmw

*Conference adjourned  
from July 25 to  
August 5, 2008 at 11:00am  
without prejudice to plaintiff's  
right to seek a default  
SO ORDERED  
USDS  
7-21-08*